

ORIGINAL

FILED
DISTRICT COURT OF GUAM

APR 04 2008 *chs*

JEANNE G. QUINATA
Clerk of Court

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14 Attorneys for Plaintiff
United States of America

15 DISTRICT COURT OF GUAM

16 TERRITORY OF GUAM

17 UNITED STATES OF AMERICA

18 Plaintiff,

19 v.

20 MARWAN SHIPPING & TRADING CO.,
21 FIVE SEAS SHIPPING CO., LLC, and S.J.
22 GARGRAVE SYNDICATE 2724,

23 Defendants.

24 Civil Case No. 06-00011

25 IN ADMIRALTY

26 NOTICE OF PROPOSED
SETTLEMENT

27 S.J. GARGRAVE SYNDICATE 2724,

28 Third-Party Plaintiff,

v.

29 NOTICE OF PROPOSED SETTLEMENT – CIVIL NO. 06-00011

1 NAVIGATORS INSURANCE CO., LLC, }
2 Third-Party Defendant. }
3
4 AND CROSS-CLAIMS, COUNTERCLAIMS. }
5

6 The United States advises the Court that a proposed settlement has been reached that
7 would resolve all claims by and between the parties, thereby obviating any further
8 proceedings before the Court other than submission of a final Order of Dismissal.

9 The United States respectfully requests that in order to secure all necessary settlement
10 authority of the relevant parties' principals with respect to the terms of the settlement and
11 proposed dismissal, all presently scheduled pretrial and trial dates be taken off calendar,
12 including the Preliminary Pretrial Conference set for April 7, 2008, at 9:00 a.m. Assuming
13 that the settlement is consummated, it is believed that the proposed Order of Dismissal
14 reasonably can be filed no later than 30 days hereafter.

15 Respectfully Submitted,

16 LEONARDO M. RAPADAS
17 United States Attorney

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22 (Mikel Schwab for R. Michael Underhill)
23 R. MICHAEL UNDERHILL
24 Attorney in Charge, West Coast Office
Torts Branch, Civil Division

25 Attorneys for Plaintiff United States of America

CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on April 4, 2008, I served a copy of the foregoing
3 NOTICE OF PROPOSED SETTLEMENT and this Certificate of Service by first-class mail,
4 postage prepaid, to:

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